



C. N/A.

D. These defendants deny the allegations contained within paragraph II.D.

### **III. Prisoner Status**

These defendants deny that Plaintiff was solely a pretrial detainee during his incarceration as alleged within paragraph III.

### **IV. Statement of Claim**

A. N/A.

B. N/A.

C-D. Response to D.E. 19, page 146-148 of Amended Complaint. These defendants admit that Plaintiff requested a religious diet but deny that such diet was requested prior to November 2023 from Chaplain Baker. These defendants further deny that Chaplain Baker is responsible for religious diets in the Maury County Jail.

These defendants deny that the defendants engaged in cruel and unusual punishment. However, these defendants admit that Plaintiff did file grievances in March 2023 regarding a desire to have a hot meal, some to Lt. Maddox and some to Lt. Harris. These defendants deny that Lt. Maddox or Lt. Harris employ Trinity Foods.

These defendants currently lack sufficient information or knowledge regarding whether Plaintiff was fed meat on March 7, 2023. However, these defendants deny that they fed him the meal or participated in such incident. These defendants further admit that Plaintiff was provided with a special diet tray. These defendants deny that as retaliation or cruel and unusual punishment, they forced him to eat the same tray every day. These defendants currently lack sufficient information or knowledge to admit or deny the content of the special diet tray.

Upon information and belief, these defendants deny that C.O. Bailey told Plaintiff that he was fed turkey, not soy. These defendants, upon information and belief, further deny that Plaintiff was sick for weeks as alleged due to eating turkey.

These defendants deny the allegations contained with the first paragraph of page (D.E. 19, PageID# 148).

These defendants admit that hot meals were not provided to any inmates during kitchen construction, but deny all remaining allegations contained within D.E. 19, page 148.

## **V. Injuries**

These defendants deny that the plaintiff suffered any injuries as a result of their actions.

## **VI. Relief**

These defendants deny that the plaintiff is entitled to any relief as requested in paragraph VI.

## **VII. Exhaustion of Administrative Remedies Administrative Procedures**

A. These defendants admit the allegations contained within paragraph VII.A.  
B. These defendants admit the allegations contained within paragraph VII.B.  
C. These defendants admit the allegations contained within paragraph VII.C insofar as the grievances cover some of Plaintiff's claims. Any remaining allegations are denied.

D. These defendants admit that Plaintiff filed some grievances about some of the issues raised in the complaint as alleged within paragraph VII.D.

E. These defendants admit that Plaintiff filed some grievances but deny that Plaintiff was not supplied with a dietary tray compliant with his religious practices.

These defendants admit that Plaintiff was provided with bean patties and cooked vegetables. These defendants deny that Plaintiff properly appealed pursuant to the grievance procedure.

F. N/A.

G. N/A.

### **VIII. Previous Lawsuits**

Upon information and belief, these defendants admit the allegations contained within paragraph VIII pertaining to three strikes.

A. Upon information and belief, these defendants deny the allegations contained within paragraph VIII.A. This suit was filed under the same case number as identified.

B. Upon information and belief, these defendants deny the allegations contained within paragraph VIII.B regarding the mentioned lawsuit being a different suit. This suit was filed under the same case number as identified.

C. N/A.

D. N/A.

### **AFFIRMATIVE DEFENSES**

1. The complaint fails to state a claim upon which relief can be granted.
2. These defendants acted reasonably and no act or omission on behalf of these defendants violated or interfered with Plaintiff's rights as alleged.
3. To the extent that the plaintiff has properly stated a cause of action under 42 U.S.C. § 1983 against the individual defendants, they are entitled to qualified immunity from money damages in this matter.

4. These defendants request that they be awarded attorney's fees as well as costs and expenses pursuant to the provisions of 42 U.S.C. § 1988 and as otherwise provided by law.

5. These defendants aver that the Plaintiff is barred from suit for failure to exhaust his administrative remedies.

6. These defendants aver that no action or inaction on their part deprived the plaintiff of any interest protected by the Federal Constitution, the Constitution of the State of Tennessee, or any other applicable federal or state statute or law.

7. These defendants specifically reserve the right to amend this pleading and plead further depending upon the facts that become available during the discovery process.

Wherefore having answered the allegations contained within the amended complaint and having set forth its affirmative defenses, these defendants respectfully request that this action be dismissed, and costs taxed to the plaintiff.

Respectfully submitted,

/s/ Robyn Beale Williams

Robyn Beale Williams, BPR #19736

**FARRAR | BATES | BEREXA**

12 Cadillac Drive, Suite 480

Brentwood, Tennessee 37207

Phone: 615-254-3060

Fax: 615-254-9835

[rwilliams@fbb.law](mailto:rwilliams@fbb.law)

*Counsel for Roger Maddox, David Baker, and  
Brandon Harris*

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this the 2<sup>nd</sup> day of May, 2024, a true and correct copy of the foregoing has been forwarded via the U.S. Mail, certified, return receipt, and the Courts electronic filing system, to:

Carlos M. Farris  
#391233  
Bledsoe County Correctional Complex  
1045 Horsehead Road  
Pikeville, TN 37367  
*Pro Se Plaintiff*

Kitchen Steward Kacey  
Trinity Food Services  
Maury County Jail  
1300 Lawson White Drive  
Columbia, TN 38401  
*Defendant*

Trinity Food Services  
Maury County Jail  
1300 Lawson White Drive  
Columbia, TN 38401  
*Defendant*

/s/ Robyn Beale Williams  
Robyn Beale Williams